

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	411785
<015> Study Area Name	J. B. N. TEL CO INC
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Rita Davis
<035> Contact Telephone Number: Number of the person identified in data line <030>	7858665130 ext.3410
<039> Contact Email Address: Email of the person identified in data line <030>	ritad@jbntelco.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	53	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	411785ks330.pdf <div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 411785ks510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 411785ks610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> 411785ks1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(200) Service Outage Reporting (Voice)
Data Collection Form**

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July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Rita Davis
<035>	Contact Telephone Number - Number of person identified in data line <030>	7858665130 ext. 3410
<039>	Contact Email Address - Email Address of person identified in data line <030>	ritad@jnbntelco.com

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	ritad@jbntelco.com

<910>	Tribal Land(s) on which ETC Serves	All Kickapoo Reservation lands residing within JBN territory boundaries.
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<920>	Tribal Government Engagement Obligation	411785ks920.pdf	Name of Attached Document
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If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select (Yes,No, NA)
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Data Collection Form		July 2013	

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411785ks1200.pdf

Name of Attached Document

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	
<1220>	Link to Public Website	HTTP http://jbntelco.com/localphone_lifeline.html

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification
<2013>	2014 Frozen Support Certification
<2014>	2015 Frozen Support Certification
<2015>	2016 and future Frozen Support Certification
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>	Interim Progress Community Anchor Institutions	
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Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation					
Data Collection Form					
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013					
<010>	Study Area Code	411785			
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ritad@tntelco.com			
CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.					
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	Name of Attached Document Listing Required Information			
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>			
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)			
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="radio"/> Yes <input type="radio"/> No			
(3014)	If yes, does your company file the RUS annual report	<input type="checkbox"/>			
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:					
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>			
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>			
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)			
(3018)	If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>			
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>			
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>			
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>			
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information			

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: J. B. N. TEL CO INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/25/2014
Printed name of Authorized Officer: Roger DelFiacco	
Title or position of Authorized Officer: Secretary/Controller	
Telephone number of Authorized Officer: 7858663402 ext.	
Study Area Code of Reporting Carrier: 411785	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

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<039> Contact Email Address - Email Address of person identified in data line <030>	ritad@jbntelco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

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J. B. N. TEL CO INC

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Rita Davis

<035> Contact Telephone Number - Number of person identified in data line <030>

7858665130 ext.3410

<039> Contact Email Address - Email Address of person identified in data line <030>

ritad@jbnritelco.com

<701> Residential Local Service Charge Effective Date

1/1/2014

<702> Single State-wide Residential Local Service Charge

16.75

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
KS	245		PR	16.75	0.0	1.44	0.2	18.39
KS	247		PR	16.75	0.0	1.44	0.2	18.39
KS	265		PR	16.75	0.0	1.44	0.0	18.19
KS	358		PR	16.75	0.0	1.44	0.2	18.39
KS	467		PR	16.75	0.0	1.44	0.2	18.39
KS	729		PR	16.75	0.0	1.44	0.2	18.39
KS	732		PR	16.75	0.0	1.44	0.2	18.39
KS	763		PR	16.75	0.0	1.44	0.2	18.39
KS	778		PR	16.75	0.0	1.44	0.0	18.19
KS	834		PR	16.75	0.0	1.44	0.0	18.19
KS	866		PR	16.75	0.0	1.44	0.2	18.39
KS	868		PR	16.75	0.0	1.44	0.0	18.19
KS	933		PR	16.75	0.0	1.44	0.2	18.39
KS	939		PR	16.75	0.0	1.44	0.2	18.39
KS	948		PR	16.75	0.0	1.44	0.0	18.19
KS	987		PR	16.75	0.0	1.44	0.2	18.39

**(800) Operating Companies
Data Collection Form**

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<810>	Reporting Carrier	J.B.N. Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	J.B.N. Telephone Company

<813>	<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
	BRETTON WOODS TELEPHONE COMPANY, INC	120038	Bretton Woods, WorldSurfer
	CASSADAGA TELEPHONE COMPANY	150076	Cassadaga, DFT, Netsync, DFT Communications
	DUNKIRK & FREDONIA TELEPHONE COMPANY	150091	Dunkirk & Fredonia Telephone, DFT, Netsync, DFT Communications
	UPPER PENINSULA TEL	310732	Michigan Broadband Services, Upper Peninsula Telephone Company, Michigan Central Broadband Company
	MICHIGAN CENTRAL BROADBAND COMPANY	310785	Michigan Broadband Services, MCBC
	BELMONT TEL CO	330847	Belmont, LaGrant Connections, LLC
	CITY TELEPHONE CUBA EXCHANGE COMPANY	330872	Cuba City, LaGrant Connections, LLC
	CENTRAL SCOTT TEL CO	351125	Central Scott
	CST COMMUNICATIONS, INC.	359032	CST Communications, iwireless
	INTERCOMMUNITY TELEPHONE COMPANY	381616	Intercommunity
	HAVILAND TEL CO	411780	Havilland
	J. B. N. TEL CO INC	411785	J.B.N. Telephone CO. INC
	WESTERN NEW MEXICO TELEPHONE COMPANY, INC	492268	WNM Communications
	CENTRAL UTAH TEL INC	502277	CentraCom Interactive
	SKYLINE TELECOM	502283	CentraCom Interactive
	BEAR LAKE COMM	503032	CentraCom Interactive
	CAL-ORE TELEPHONE COMPANY	542311	Cal-Ore
	Giant Communications, Inc.		Giant
	Alpha Enterprise Limited, Inc.		Alphacom.net
	World Surfer, Inc		World Surfer
	Netsync Internet Services Corporation		Netsync
	Valley Communications, Inc.		Valley
	Central Telcom Services, LLC.		CentraCom Interactive

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<810>	Reporting Carrier	J.B.N. Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	J.B.N. Telephone Company

[illegible]

JBN Telephone Company Lifeline Terms and Conditions

The Lifeline Service Program (Lifeline), sponsored by the FCC is a program designed to maintain and preserve universal service by providing a reduction in the price of basic residential exchange service to qualifying low-income customers. The Company's voice lifeline plan includes unlimited local minutes-of-use within the toll-free calling area. The Company's voice lifeline plan does not include any free minutes-of-use for toll.

A. GENERAL

1. Lifeline is a federally funded reduction of basic local residential service. The Federal credit amount (CR) provided to Lifeline subscribers will be the maximum amount authorized by the FCC.
 - a. Lifeline customers will also receive additional Lifeline Service reductions in intrastate local service of \$7.77.
 - b. In no event shall the Local Exchange access service rate be reduced below zero.
2. Local service for Lifeline customers may not be disconnected for nonpayment of toll charges.
 - a. Toll Restriction Service will be provided to Lifeline customers at no charge.
 - b. Lifeline customers are not required to accept Toll Restriction Service as a condition to avoid disconnection of local service for non-payment of toll.
 - c. Lifeline customers are not required to pay a deposit in order to obtain local service if the customer voluntarily elects installation of Toll Restriction Service.
3. Partial payment from Lifeline customers will be applied first to local service charges and then to toll charges.
4. Lifeline customers will not be denied reestablishment of service on the basis that the customer was previously disconnected for non-payment of toll charges.
5. Lifeline will not be furnished on a Foreign Exchange service arrangement.

B. ELIGIBILITY REQUIREMENTS

1. Lifeline will be provided for on (1) telephone line per household, at the customer's principal place of residence who have only on local exchange access line to his/her residential premises or dwelling place.* Verification of this requirement will be through self-certification.
2. Show that he/she is currently a recipient of benefits from one of the following public assistance programs:
 - Federal Public Housing Assistance/Section 8
 - Low Income Home Energy Assistance Program (LIHEAP)
 - Supplemental Nutrition Assistance Program
 - General Assistance
 - Supplemental Security Income (SSI)
 - Temporary Assistance to Needy Families (TAR)
 - Medicaid
 - Food Distribution Program
 - Free School Lunch Program
 - Individuals living on tribal land receiving:
 - Food Distribution Program
 - Bureau of Indian Affairs General Assistance
 - Tribally administered Temporary Assistance for Needy Families (TANF)
 - Head Start (tribal programs for only those meeting it's income qualifying standard)
 - Tribally administered Free School Lunch Program

Individuals choosing this option must obtain and provide to the Telephone Company a copy of a valid identification card or the appropriate documents that are issued to them by the agency administering the program.

Income Eligibility

A customer shall be eligible for the Lifeline Service Program if that customer's household annual income level is at or below 150% of the federal poverty level. Such customers may obtain a form from the Telephone Company suitable for self-certification of income level and provide the completed form to the Company to begin service under the program. Proof of income is required. Acceptable documentation may include the prior years federal, state, or tribal tax return, or other forms of income certification. Customers should contact the Company for specific details.

Certification

- o. The customer will certify eligibility for Lifeline Service. Recertification is required annually or at any time the qualifying criteria for the customer changes.

Recipients of Lifeline Service must notify the Telephone Company when they no longer qualify for Lifeline Service. Upon receipt of the notification, the Telephone Company will discontinue Lifeline Service.

If the Telephone Company discovers that conditions exist that disqualify the recipient of Lifeline Service, local service will be billed at the full rate. The customer will be billed retroactively either to the date Lifeline Service commenced or the date the recipient no longer qualified for the service, not to exceed twelve (12) months.

*A residential premises or dwelling place is that location where a customer resides, even if such residential premises or dwelling place is only a single room. Lifeline will not be provided if the customer has access to other local exchange telephone service within the residential premises or dwelling place, provided/owned by himself/herself or owned/provided by others. However, it can be determined by the Telephone Company that access to other existing local exchange telephone service owned/provided by others is virtually denied, or is inaccessible to the customer, then Lifeline Service will be provided.

JBN Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan

As required in 47 C.F.R. § 54.202(a)(1)(ii), the following pages provide the Company's five-year service quality improvement plan that describes with specificity the proposed improvements and/or upgrades over the next five years to the applicant's network throughout the Company's service area. While the plan being presented for this Rural Local Exchange Carrier ("RLEC") is based on the best information that we have at this time, it is important to note that circumstances may change, such that the five-year service quality improvement plan being presented herein, may need to change substantially including, but not limited to, changes based on factors such as those listed below:

ISSUES WHICH MAY REQUIRE FUTURE MODIFICATIONS TO THE COMPANY'S FIVE-YEAR PLAN:

The five-year plan, as detailed on the following pages, is subject to the following:

- 1) **Revenue Recovery:** The ability to finance the capital expenditures planned for the five-year plan period, either through internally generated funds or external financing, are predicated on the expected revenue flows to be derived by these capital expenditures. If revenues would not be achieved either due to changes in regulations including, but not limited to, reductions in federal or state universal service support mechanisms or inter carrier compensation or by significant reductions in the number of services subscribed to by the Company's customers, adjustments to the proposed capital expenditures in the five-year plan would be required. For example, if the support revenues that would be derived based on the capital expenditures would be reduced due to eliminations of Universal Service Fund ("USF") mechanisms or significant changes to those USF programs, revisions to the five-year plan may be required.

In addition, if USF programs remain the same, but due to the computation of the program, USF revenues decline, adjustments to the five-year plan may be required. For example, if increases in the National Average Cost Per Loop ("NACPL"), which are very difficult to predict, substantially reduces the High Cost Loop Support ("HCLS") for the Company or if the impact of the corporate cap on the Interstate Common Line Support ("ICLS") mechanisms were to substantially reduce the Company's USF payments, then the capital expenditures in the five-year plan may need to be reduced.

- 2) **Permits:** It is not possible to predict the ability to obtain all necessary permits, including easements and rights-of-way, within the five-year time-frame required to complete the capital expenditures included in the Company's five-year plan. Permits can be, and often are, delayed significantly by various governmental agencies and those delays are totally outside the control of the Company.

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

- 3) **Weather Issues:** It is not possible to predict the impact of the weather on the installation of the capital expenditures included in the Company's five-year plan. For example, if the ground is frozen, the timing of installing facilities can be significantly delayed and those delays are totally outside the control of the Company.
- 4) **Lead Time to Obtain Materials from Vendors:** It is not possible to predict when a material critical for the capital expenditures included in the Company's five-year plan may come into a shortage situation. For example, in the last couple of years, the industry experienced a shortage of fiber optic cable where there was an 18 month lead time to obtain fiber optic cable. Delays of this nature are impossible to predict and are totally outside the control of the Company.
- 5) **Lead time to get Contractors to Install Facilities:** Just as with the materials, the Company has experienced times when it was not able to obtain contractors to install the equipment because the Company is not large enough compared to other firms wanting the contractor to do work for them. Therefore, the Company had to wait until much later than anticipated to get the contractor to come install the facilities for them. Once again, delays of this nature are impossible to predict and are totally outside the control of the Company.
- 6) **Increases in Construction Costs:** Just as with any business, it is impossible to predict if certain key material or installation costs will increase significantly during the period of time included in this five-year plan. During the last few decades, the telecommunications industry has undergone periods of time where material and installation costs escalated due to circumstances beyond the control of the Company (e.g., Hurricane Katrina, etc.). Price increases of this nature are impossible to predict and are totally outside the control of the Company.

If any of these, or items similar to these, occur, the Company may need to modify the five-year plan.

FIVE-YEAR PLAN OVERVIEW:

In addition to providing voice and broadband services, the company provides custom calling features and long distance services to the customers located in its service area. The Company has developed this five-year plan in order to continue to improve service quality, coverage and/or capacity to the subscribers located in its RLEC service area.

The Company provides service primarily through the use of fiber optic cable and electronics between the central offices and between the central offices and the subscriber terminal equipment (e.g., Digital Loop Carriers ("DLCs")) in the field. The last mile facilities are generally provided over copper; however, the Company has a certain amount of fiber-to-the-premise ("FTTP") facilities, as well. It is the company's intention to continue to install fiber optic cable and electronics, wherever feasible. The company has begun the transition from the TDM-based

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

network to an IP-network and is continually assessing the most cost-effective technology solutions to provide our customers the services they request.

COMPANY SERVICE AREA INCLUDED IN FIVE-YEAR PLAN:

The Company serves a very rural, sparsely populated portion of the United States where there are numerous challenges to serving the most rural customer locations. Within the RLEC's service territory of approximately 1,051 square miles, the company provides voice service to residential and business access lines and broadband service as shown below:

	Residential lines	Business Access Lines	Broadband Lines Less than 4/1	Broadband Lines 4/1 or Greater	Lines Capable of 4/1
Munden	43	14	50	10	40
Havensville	74	14	63	15	77
Goff	51	5	49	26	50
Netawaka	152	72	86	28	75
Corning	118	20	82	14	64
Wetmore	64	7	134	34	112
Soldier	95	21	64	21	57
Haddam	76	15	43	15	39
Barnes	99	8	56	17	49
Agenda	164	32	35	14	33
Cuba	111	30	67	19	58
Fairview	117	25	80	11	61
Narka	79	14	35	10	30
Morrowville	96	21	51	12	78
Mahaska	81	12	22	9	20
Employee	14	0	0	14	14
Totals	1434	310	917	269	843

Each exchange in the company only has one wire center; therefore, the five-year plan is presented at the exchange level (which is also the wire center level). The above chart shows the breakdown of the number of access lines by exchange within the RLEC territory for residence and business and the number of broadband lines subscribed to by customers at a speed less than 4 Mbps down and 1 Mbps up and those broadband lines at or above at a speed of 4 Mbps down and 1 Mbps up. As shown on the chart above, there are still a significant number of customers that subscribe to broadband service at a speed less than 4 Mbps down and 1 Mbps up. The company is making significant efforts to market and transition customers to higher speed service so that they can have the full benefit of the information super-highway.

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

TOTAL ESTIMATED CAPITAL EXPENDITURES BY EXCHANGE:

The total estimated regulated capital expenditures for the RLEC for each of the years in the five-year plan in each of the Company's exchanges are estimated to be as follows:

000's omitted

Years	2015	2016	2017	2018	2019
Munden	10	175	150	80	12
Havensville	10	10	10	10	262
Goff	10	200	10	10	262
Netawaka	112	10	10	10	12
Corning	295	10	105	10	12
Wetmore	195	140	114	114	116
Soldier	10	130	10	10	12
Haddam	10	10	142	257	10
Barnes	245	10	10	47	10
Agenda	53	10	47	125	10
Cuba	10	55	180	377	10
Fairview	10	51	10	10	260
Narka	10	281	10	10	10
Morrowville	406	10	10	10	10
Mahaska	51	10	220	10	10
Totals	1437	1112	1038	1090	1018

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

FACILITIES TO SHORTEN LOOP LENGTH:

The Company understands that customers continually want and need more bandwidth. Due to the extremely remote territory of the customer, one of the obstacles to providing greater speeds to some of the Company's customers is the distance from the nearest electronic site to the customer location. Shortening that portion of the loop allows the company to provide greater speed; therefore, the Company intends to install cable and wire facilities and/or circuit equipment in each of the Company's exchanges as shown below:

000's omitted

	2015	2016	2017	2018	2019
Munden	10	175	150	80	10
Havensville	10	10	10	10	260
Goff	10	200	10	10	260
Netawaka	112	10	10	10	10
corning	295	10	105	10	10
Wetmore	105	10	10	10	10
Soldier	10	130	10	10	10
Haddam	10	10	142	255	10
Barnes	245	10	10	45	10
Agenda	53	10	45	125	10
Cuba	10	55	178	377	10
Fairview	10	45	10	10	260
Narka	10	275	10	10	10
Morrowville	400	10	10	10	10
Mahaska	45	10	220	10	10
Totals	1335	970	930	982	900

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

SWITCHING EQUIPMENT:

The Company is continuing to upgrade switching facilities due to the transformation from TDM to the IP-based technologies. These upgrades may include, but are not limited to, softswitches, media gateways or other equipment. Prior to acquisition of switching equipment, the company analyzes what would be the best technological solution since vendors go out of business, new products are released to market and upgrades may be made to existing equipment which may allow the equipment to continue to be used more cost effectively. The Company is proposing the following technological upgrades to its switching equipment shown below:

000's omitted

	2015	2016	2017	2018	2019
Mahaska	6				
Morrowville	6				
Narka		6			
Fairview		6			
Cuba			2		
Agenda			2		
Barnes				2	
Haddam				2	
Soldier					2
Wetmore					2
Corning					2
Netawaka					2
Goff					2
Havensville					2
Munden					2
Totals	12	12	4	4	14

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

INTEREXCHANGE FACILITIES:

The Company's exchanges are predominately interconnected with fiber optic cable and electronics. In a few cases, due to terrain or other conditions, microwave or other technologies, may be used. For enhancements and upgrades to the Company's interexchange facilities, the Company intends to install additional cable and wire facilities and/or circuit equipment in each of the Company's exchanges as shown below:

000's omitted

	2015	2016	2017	2018	2019
Munden	0	0	0	0	0
Havensville	0	0	0	0	0
Goff	0	0	0	0	0
Netawaka	0	0	0	0	0
Corning	0	0	0	0	0
Wetmore	0	0	0	0	0
Soldier	0	0	0	0	0
Haddam	0	0	0	0	0
Barnes	0	0	0	0	0
Agenda	0	0	0	0	0
Cuba	0	0	0	0	0
Fairview	0	0	0	0	0
Narka	0	0	0	0	0
Morrowville	0	0	0	0	0
Mahaska	0	0	0	0	0
Totals	0	0	0	0	0

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

GENERAL SUPPORT FACILITIES:

The Company must continually upgrade the general support facilities (i.e., computers, furniture, office equipment, vehicles, land and buildings) due to technology changes, obsolescence and personnel needs in order to provide both voice and broadband service to its customers. The following is the current plan for general support facility capital expenditures in the five-year plan:

000's omitted

	2015	2016	2017	2018	2019
Wetmore	90	130	104	104	104
Totals	90	100	104	104	104

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

COMPANY POLICY TO DETERMINE IF A REQUEST FOR BROADBAND SERVICE IS REASONABLE:

Under the framework adopted by the Federal Communications Commission ("FCC") in the *USF/ICC Transformation Order*, as a rate-of-return carrier, the Company, is required to deploy broadband-capable infrastructure to a customer upon reasonable request.

The FCC expressly recognized that there are some areas of the country where it is cost prohibitive to extend broadband using terrestrial wireline technology and, that in some areas, satellite or fixed wireless technologies may be more cost-effective options to extend service.

It is the Company's policy to deploy broadband-capable infrastructure to a customer, upon reasonable request, as defined below.

GENERAL POLICY:

When evaluating a request to extend broadband service, the Company shall consider whether it would be reasonable to make the necessary upgrades in light of anticipated revenues. A reasonable request is one where the Company could cost-effectively extend a voice and broadband-capable network to that location. In determining whether a particular upgrade is cost effective, the Company shall consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding projected to be available under current rules.

In considering end-user revenues, the Company shall take into account the reasonable comparability benchmark for broadband services, as appropriate. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.

A request to upgrade an existing voice line to provide broadband service would not be reasonable if it would require new investments that would cause total high-cost support, excluding CAF ICC, to exceed \$250 per line per month in a given study area.

As the FCC determined in the *Third Order on Reconsideration*, the Company may also take into account backhaul costs or other unique circumstances that may make it cost-prohibitive to extend service to particular customers.

EXTENUATING CONSIDERATIONS AND EXECUTIVE APPROVALS:

In addition to the above stated general policy, additional factors, including, but not limited to, items such the following shall be considered prior to denying the provision of broadband service based on a request of a customer as not reasonable:

JBN Telephone Company, Inc.

Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

- Extremely high potential for significant other residential or business customers in the area within a reasonable amount of time.
- Anchor institution requirements.
- Possible community development potential.
- Health and public safety concerns, including, but not limited to, E-911 issues.
- Other health, economic development and/or welfare factors.
- Financing agency or Commission, either state or federal, mandates or requirements.

If it is determined that additional, extenuating circumstances are relevant and should be considered, Company executive review and approval is required for the project to be undertaken if does not meet the terms of the general policy stated above.

FURTHER SPEED ENHANCEMENTS: If the FCC were to revise its broadband performance obligations to require higher speeds, such as 10 Mbps downstream, new deployments would, most likely, be required to meet the new benchmark. The Company would only be required to meet that higher speed if the request for service was *reasonable*.

CONCLUSION:

The Company's five-year service quality improvement plan is designed to continue to improve and upgrade facilities in order to provide customers with the highest quality voice and broadband service in the most cost-effective manner. This includes shortening the length of the loops, as needed, in order to provide greater bandwidth to the customer, augmenting and upgrading the interexchange facilities, as needed, to provide greater speeds and sufficient facilities for special access circuits, including, but not limited to, dedicated facilities to wireless towers, modifying switching equipment, as needed, in order to provide the services and features desired by the customer, and adding/replacing general support equipment, as needed, in order to continue to operate as a company and provide service to the end user.

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JBN Telephone Company, Inc.
Line 330 – Unfulfilled Broadband Service Requests Resolution

As required in 47 C.F.R. § 54.313(a)(3), the following provides the detailed description of how the Company attempted to provide service to potential customers whose initial requests for service were unfulfilled in 2013 in the service area in which the Company is designated as an ETC for facilities that the Company owns, operates, leases, or otherwise utilizes.

UNFULFILLED BROADBAND SERVICE REQUESTS – The Company had 53 unfilled broadband service requests as of December 31, 2013 which generally fit into the following three categories.

- A. Some unfilled requests were due to customer issues such as the customer does not have a structure yet, the customer was not ready, the customer has not provided an easement, the customer is on BIA land and needs to open the ditch for the Company, etc.
- B. Some unfilled request was due to pending state highway permits.
- C. Most unfulfilled requests are receiving service just not at the higher speed they would like at this time. Due to the loop length.

GENERAL PROCESS: The first step in the process of providing service was to have the Company's technical staff determine if current facilities exist to the customer location that are capable of providing broadband service and what the maximum broadband speed that could be provided. The Company has extremely long loops in some of the most rural portions of our territory and broadband speed is extremely distance sensitive.

Based on the analysis, once it was determined that facilities do not currently exist or that the distance is too great to provide broadband, a route upgrade feasibility analysis is prepared including an estimate of what facilities would be needed and the cost to build to the customer.

DELAYS DUE TO PERMITS: In some cases, service installations become delayed due to permit(s) that are required to install the new facilities. The Company works with a myriad of government agencies and cannot install new facilities absent the appropriate government permit(s). In those cases, the Company informs the customer that we are awaiting permit(s) and that the facilities will be installed once the appropriate permit(s) are obtained. In some cases, the governmental agency has taken multiple years to approve permit(s).

Please note that since the Company's territory is extremely rural, in areas where the Company does not own facilities, it is not possible to lease facilities from other companies since there are no other service providers in those extremely remote areas.

JBN Telephone Company, Inc.

Line 510 –Compliance with Service Quality Standards and Consumer Protection

As required in 47 C.F.R. § 54.313(a)(5) for High-cost Recipients, the following is a detailed description of how the Company complies with Service Quality Standards and Consumer Protection Rules.

SERVICE QUALITY STANDARDS: The Company abides by the State Commission's requirements for service quality. All required reporting is done with the Company in full compliance of the service quality standard requirements.

CONSUMER PROTECTION RULES:

The Company developed and implemented a Customer Proprietary Network Information ("CPNI") Compliance Manual and has appointed a CPNI Compliance Officer. Annually, the Company requires all employees to certify that they have reviewed and understand the CPNI Compliance Manual and that they understand that any violation of the Company's CPNI procedures may result in disciplinary action up to and including dismissal. The Company files an annual report with the Federal Communications Commission ("FCC") certifying compliance with the FCC's CPNI rules.

The Company also developed and implemented an Identity Theft Prevention Program Manual and has appointed a Red Flag Coordinator. Annually, the Company requires all employees certify that they have reviewed and understand the Identity Theft Prevention Program Manual. Further, employees must certify that they understand that any violation of the Company's identity theft prevention procedures may result in disciplinary action up to and including dismissal.

JBN Telephone Company, Inc.
Line 610 – Functionality in Emergency Situations

As required in 47 C.F.R. § 54.313(a)(6) for all high cost recipients, which includes the Company, and as set forth in 47 C.F.R. § 54.202(a)(2), the following provides a detailed description demonstrating that the Company has the ability to remain functional in emergency situations, including a demonstration that 1) it has a reasonable amount of back-up power to ensure functionality without an external power source, 2) is able to reroute traffic around damaged facilities, and 3) is capable of managing traffic spikes resulting from emergency situations.

OVERALL RESPONSE TO EMERGENCY SITUATIONS: The Company has a comprehensive disaster recovery plan (also called a "continuity plan") that was developed and implemented for the Company specifically to deal with emergencies. It has detailed, specific steps that are to be taken for each type of emergency.

POWER: In order to function in an emergency, the Company has a combination of batteries and emergency generators. Some locations have permanent emergency generators with fuel tanks; whereas, other locations require a portable generator to be brought to the location to recharge the on-site batteries. The company owns several portable generators that technicians can take out to recharge the batteries. For example, the company's central offices have automatic stand-by generators to run the entire offices. The digital loop carrier ("DLC") sites also have battery back-up.

REROUTING TRAFFIC AND REDUNDANCY: The Company has established 100% redundant E-911 trunks and SS-7 routes. In addition, the network was designed with redundancy, wherever possible, especially in the backbone network. Where it is not redundant, the Company has the ability to redirect most backbone traffic. In cases where there is no redundancy, it is due to the extreme cost of a 100% redundant network. For example, the loop to the customer location is typically not redundant, especially for residential customers. This is because it would not be cost effective to build totally separate facilities for the "last mile" to the customer.

MANAGING TRAFFIC SPIKES: The Company realizes that when a catastrophe happens, everyone immediately tries to contact friends and family to make certain they are all right. The Company has designed the network to have excess capacity on its backbone network. For example, on Mother's Day, the company handles traffic without the customer receiving the "All Trunks Busy" message which demonstrates the Company's ability to handle peak traffic spikes.

[illegible]

Service Offerings	Rates	Rates	Residential	Business	Total
	Residential	Business	Residential	Business	Total
FTTH Start 1.5M/768k	49.95	59.95	19	1	20
FTTH Bronze 6M/3M	59.95	69.95	18	2	20
FTTH Silver 3M/1.5M	69.95	79.95	8	0	8
FTTH Gold 10M/3M	79.95	89.95	0	0	0
FTTH Platinum 15M/5M	89.95	99.95	3	0	3
DSL Start/Bronze 768k/256k	49.95		7		7
DSL Bronze 1M/384k	59.95		54		54
DSL Silver 6M/1M	69.95		12		12
DSL Gold 12M/1M	89.95		3		3
FTTH voice + Start 1.5M/768k	29.95	39.95	108	1	109
FTTH voice + Bronze 6M/3M	39.95	49.95	35	8	43
FTTH voice + Silver 3M/1.5M	49.95	59.95	43	3	46
FTTH voice + Gold 10M/3M	59.95	69.95	4	0	4
FTTH voice + Platinum 15M/5M	69.95	79.95	10	6	16
DSL Start/Bronze 1M/384k	29.95	49.95	647	17	664
DSL Silver 6M/1M	49.95	59.95	125	13	138
DSL Gold 12M/1M	69.95	79.95	18	7	25

**JBN Telephone Company
Line 920 – Tribal Land Issues**

As required in 47 C.F.R. § 54.313(a)(9), the following provides the detailed description of the efforts by the Company related to discussions with Tribal governments that, at a minimum, included: (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

Line 921 – Needs Assessment and Deployment Planning: The Company's actions to address needs assessment and deployment planning with a focus on tribal community anchor institutions for the tribal land network are as follows: Between the dates of May 1st, 2014- May 16th, 2014 the Company made a minimum of 5 phone calls to the Kikapoo tribal office. Two messages were left with the receptionist asking her to have Steve Cadue (Tribal Council Chairman) or another tribal council member call me back. I also left 3 voicemails directly for Steve Cadue (Tribal Council Chairman). I did not receive any attempt to contact me in return.

Line 922 – Feasibility and Sustainability Planning: The Company's actions to address feasibility and sustainability planning for the tribal land network are as follows: As discussed above, the JBN Telephone Company's limited success with Tribal engagement has minimized Tribal supported initiatives associated with facility expansion to provide additional or increased service offerings.

Line 923 – Marketing Services in a Culturally Sensitive Manner: The Company's actions to address the marketing of services in a culturally sensitive manner in the tribal land are as follows: As discussed above, JBN Telephone Company tried, with limited success, to engage the Tribe to discuss if the Tribe had any suggestions or ideas for improving the company's marketing efforts.

Line 924 – Compliance with Right of Way Processes: The Company's actions to comply with the right-of-way processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss right-of-way processes for its tribal lands. Historically, JBN Telephone Company has complied with any regulations, set forth by the Kikapoo Tribe and has consistently sought approval prior to commencement of any construction and/or maintenance activities.

Line 925 – Compliance with Land Use Permitting Requirements: The Company's actions to comply with the land use permitting requirements for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the land use

permitting requirements for its tribal lands. As identified on Line 924, JBN Telephone Company has complied with any regulations, set forth by the Kikapoo Tribe and has consistently sought approval prior to commencement of any construction and/or maintenance activities.

Line 926 – Compliance with Facility Siting Rules: The Company's actions to comply with the facilities siting rules for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss and establish requirements and define compliance with the siting rules for its tribal lands. As identified on Line 924, JBN Telephone Company has complied with any regulations, set forth by the Kikapoo Tribe and has consistently sought approval prior to commencement of any construction and/or maintenance activities.

Line 927 – Compliance with Environmental Review Processes: The Company's actions to comply with the environmental review processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the environmental review processes for its tribal lands. As identified on Line 924, JBN Telephone Company has complied with any regulations, set forth by the Kikapoo Tribe and has consistently sought approval prior to commencement of any construction and/or maintenance activities.

Line 928 – Compliance with Cultural Preservation Review Processes: The Company's actions to comply with the cultural preservation review processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the cultural preservation review processes for its tribal lands. As identified on Line 924, JBN Telephone Company has complied with any regulations, set forth by the Kikapoo Tribe and has consistently sought approval prior to commencement of any construction and/or maintenance activities.

Line 929 – Compliance with Tribal Business and Licensing Requirements: The Company's actions to comply with the tribal business and licensing requirements for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss if the Tribe believes there are other licenses the Company should acquire to provide telecommunications services on its tribal lands.

JBN Telephone Company, Inc.
Line 1010 – Voice Services Rate Comparability

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau. The following provides the Company's support for Line 1010 - Description of Voice Service Rate Comparability.

As of January 1, 2014, the Company charges the following fixed voices prices for residential service:

Flat Rate Residential Service	\$16.75
State Subscriber Line Charge	0.00
State Universal Service Charge	1.44
Mandatory Extended Area Service	0.20
Residential Federal Subscriber Line Charge	<u>6.50</u>
Total Residential Fixed Voice Charges	<u>\$24.89</u>

Since the total for residential fixed voice that the Company charges, as shown above, is below the \$46.96, which is two standard deviations above the applicable national average urban rate for voice services, announced by the FCC Wireline Competition Bureau in the Public Notice released on March 20, 2014 (DA 14-384), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).